



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
FILED

AUG 08 2023

US DISTRICT COURT  
DISTRICT OF NEVADA

SEALED

Office of the United States Attorney  
District of Nevada  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336

AUG 08 2023

US DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GIANNI NAMIR McKINNEY,  
a.k.a. "Bandman G,"

Defendant.

Case No. 2:23-mj-00731-NJK

## SEALING ORDER

Based on the United States' *ex parte* application, with good cause appearing  
therefore,

IT IS ORDERED that the Criminal Complaint, Arrest Warrant, Writ of *Habeas Corpus ad  
Prosequendum*, applications for each, and this Court's instant order in the above captioned  
matter are sealed in accordance with Local Rule IA 10-5 until further order of the Court.

IT IS SO ORDERED this August 8, 2023.



THE HONORABLE NANCY J. KOPPE  
UNITED STATES MAGISTRATE JUDGE

FILED

AUG 08 2023

US DISTRICT COURT  
DISTRICT OF NEVADA

1 JASON M. FRIERSON  
 2 United States Attorney  
 3 District of Nevada  
 4 Nevada Bar Number 7709  
 5 DANIEL J. COWHIG  
 6 Assistant United States Attorney  
 7 501 Las Vegas Blvd. South, Suite 1100  
 8 Las Vegas, Nevada 89101  
 9 (702) 388-6336  
 10 daniel.cowhig @usdoj.gov  
 11 *Attorneys for the United States of America*

7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,  
 10 Plaintiff,  
 11 vs.  
 12 GIANNI NAMIR McKINNEY,  
 13 a.k.a. "Bandman G,"  
 14 Defendant.

Case No. 2:23-mj-00731-NJK  
 UNITED STATES' EX PARTE  
 APPLICATION TO SEAL  
 CRIMINAL COMPLAINT, WRIT OF  
 HABEAS CORPUS AD  
 PROSEQUENDUM, ARREST  
 WARRANT AND APPLICATION

15 The United States of America, by and through Jason M. Frierson, United States  
 16 Attorney for the District of Nevada, and Daniel J. Cowhig, Assistant United States  
 17 Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint,  
 18 Arrest Warrant, Writ of *Habeas Corpus ad Prosequendum*, applications for each, and the  
 19 Court's Sealing Order in the above captioned matter until such time as this Court, or  
 20 another Court of competent jurisdiction, shall order otherwise.

21 It is necessary to seal the complaint and the related documents in this case because  
 22 they reveal information connected to ongoing investigations involving both the named  
 23 defendant and confederates. Public disclosure of the information contained in the  
 24 complaint may compromise ongoing investigations, risk the safety of victims and

1 witnesses, alert confederates to the existence of the investigations, and permit flight in  
2 order to avoid prosecution. Further, while the named defendant is currently held at the  
3 Clark County Detention Center, were he to be released prior to the service of the writ,  
4 necessitating an arrest on the requested warrant, his prior knowledge of the complaint and  
5 arrest warrant might pose risks to law enforcement officers executing that arrest.

6 To avoid premature exposure of ongoing investigations, protect the safety of  
7 victims and witnesses, and to facilitate defendant's arrest on the requested warrant, if  
8 necessary, the United States respectfully requests this Honorable Court grant the United  
9 States' motion to seal the Complaint, Arrest Warrant, Writ of *Habeas Corpus ad*  
10 *Prosequendum*, applications for each, and the Court's Sealing Order in the above captioned  
11 matter in accordance with Local Rule IA 10-5 until further order of the Court.

12 Respectfully submitted this August 8, 2023.

13 JASON M. FRIERSON  
14 United States Attorney



15 DANIEL J. COWHIG  
16 Assistant United States Attorney